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United States Bankruptcy Court Eastern District of Pennsylvania

In re: Lamont Ragsdale, Sr. Debtor Case No. 19-15202-amc Chapter 13

CERTIFICATE OF NOTICE

District/off: 0313-2 User: Lisa Page 1 of 1 Date Rcvd: May 11, 2020 Form ID: pdf900 Total Noticed: 1

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on May 13, 2020.

db +Lamont Ragsdale, Sr., 79 W Sharpnack Street, Philadelphia, PA 19119-2722

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center. NONE. TOTAL: 0

***** BYPASSED RECIPIENTS *****

NONE. TOTAL: 0

Addresses marked '+' were corrected by inserting the ZIP or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.

Transmission times for electronic delivery are Eastern Time zone.

I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed. R. Bank. P. 2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: May 13, 2020 Signature: /s/Joseph Speetjens

CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on May 11, 2020 at the address(es) listed below:

DAVID M. OFFEN on behalf of Debtor Lamont Ragsdale, Sr. dmol60west@gmail.com,

davidoffenecf@gmail.com;offendr83598@notify.bestcase.com

KEVIN G. MCDONALD on behalf of Creditor Deutsche Bank National Trust Company, as Trustee of Vendee Mortgage Trust 2008-1 bkgroup@kmllawgroup.com

REBECCA ANN SOLARZ on behalf of Creditor Deutsche Bank National Trust Company, as Trustee of

Vendee Mortgage Trust 2008-1 bkgroup@kmllawgroup.com United States Trustee USTPRegion03.PH.ECF@usdoj.gov

WILLIAM C. MILLER, Esq. ecfemails@ph13trustee.com, philaecf@gmail.com

TOTAL: 5

IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

| Lamont Ragsdale Sr. <u>Debtor(s)</u> | CHAPTER 13 |
|--|-----------------------|
| Deutsche Bank National Trust Company, as Trustee of Vendee Mortgage Trust 2008-1 <u>Movant</u> vs. | NO. 19-15202 AMC |
| Lamont Ragsdale Sr. Debtor(s) William C. Miller Esq. Trustee | 11 U.S.C. Section 362 |

STIPULATION

AND NOW, it is hereby stipulated and agreed by and between the undersigned as follows:

- 1. On or about April 8, 2020, Movant filed a Motion for Relief in the underlying bankruptcy due to unpaid water/sewer rents with regards to the Property located at 79 West Sharpnack Street, Philadelphia, PA 19119 (hereinafter refers to as "the Property").
- 2. As of May 1, 2020, the amount owed for the Water/Sewer rents has been negotiated to \$3,296.52, plus fees and costs relating to the motion at \$850 in legal fees and \$181 in filing costs for a total amount in default of \$4,327.52
 - 3. The Debtor(s) shall cure said arrearages in the following manner:
- a) Within seven (7) days of the filing of this Stipulation, Debtor shall file an Amended Chapter 13 Plan to include the post-petition arrears of \$4,327.52;
- b) Movant shall file an Amended or Supplemental Proof of Claim to include the postpetition arrears of \$4,327.52 along with the pre-petition arrears; and
- d) The new 410A form for a Proof of Claim shall not be required for this Amended or Supplemental Proof of Claim.

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4. Ongoing thereafter, Debtor shall remain current on all utility bills, including but limited to

rent, sewer, and trash, with regards to the Property.

5. Debtor shall also remain current on all regular post-petition payments to Movant.

6. Should Debtor provide sufficient proof of payments made, but not credited (front & back

copies of cancelled checks and/or money orders), Movant shall adjust the account accordingly.

7. In the event Debtor's actions required under Section 3 are not performed or the payments

under Sections 4 and/or 5 above are not tendered pursuant to the terms of this stipulation, Movant shall

notify Debtor and Debtor's attorney of the default in writing and the Debtor may cure said default within

FIFTEEN (15) days of the date of said notice. If Debtor should fail to cure the default within fifteen (15)

days, Movant may file a Certification of Default with the Court and the Court shall enter an Order granting

Movant immediate relief from the automatic stay and waiving the stay provided by Bankruptcy Rule

4001(a)(3).

8. If the case is converted to Chapter 7, Movant shall file a Certification of Default with the

Court and the Court shall enter an order granting Movant relief from the automatic stay.

9. If the instant bankruptcy is terminated by either dismissal or discharge, this agreement shall

be null and void, and is not binding upon the parties.

10. The provisions of this stipulation do not constitute a waiver by Movant of its right to seek

reimbursement of any amounts not included in this stipulation, including fees and costs, due under the terms

of the loan documents and applicable law.

11. The parties agree that a facsimile signature shall be considered an original signature.

Date: May 5, 2020

By: /s/ Rebecca A. Solarz, Esquire

Attorney for Movant

May 5, 2020 Date:

/s/ David M. Offen, Esq.

David M. Offen Esq.

Attorney for Debtor(s)

| | ed 05/13/20 Entered 05/14/20 (cate of Notice Miller, Esquire, for* | 00:46:98 objessingaged _{rms,} without prejudice to any of our |
|---|--|---|
| Date. | William C. Miller, Esquire Chapter 13 Trustee | rights and remedies |
| Approved by the Court this day of discretion regarding entry of any further | | ever, the court retains |
| Date: May 8, 2020 | Bankruptcy Judge | *** <u></u> |
| | Ashely M. Chan | |